## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

UNITED STATES OF AMERICA, )	
Plaintiff,  v.  JEFFERSON COUNTY, et al.,	Civil Action No. CV-75-S-666-S
Defendants. )	
JOHN W. MARTIN, et al.,  Plaintiffs,	
<b>v.</b>	Civil Action No. CV-74-S-17-S
CITY OF BIRMINGHAM, ALABAMA, et al.,	
<b>Defendants.</b> )	
ENSLEY BRANCH OF THE ) N.A.A.C.P., et al., )	Civil Action No. CV-74-S-12-S
Plaintiffs,	
<b>v.</b>	
GEORGE SEIBELS, et al.,	
<b>Defendants.</b>	

## MOTION TO FILE DOCUMENT UNDER SEAL

COMES NOW Defendant Jefferson County, Alabama (the "County"), by and through its undersigned counsel, and hereby moves this Honorable Court for leave to file under seal a Declaration of Jeffrey S. Smith, Director of the General Services Department of Jefferson County, Alabama. This declaration will be submitted to this Court as Exhibit 9 to Jefferson County's Motion to Approve Interim Selection Methods for Security Officer and WWTP Supervisor and for Approval to Hire Additional Security Officers, which the County intends to file in the near future. As grounds for this Motion, the County states as follows:

- 1. The County is preparing to request approval to hire several additional security officers to meet growing security needs and to fill multiple vacancies at the County. In support of this request, the County intends to file a declaration of the County department head over security officers.
- 2. In substantiating the need for increased security personnel, the declaration reveals details regarding security at the various County courthouse locations that it would prefer the public not have access to as a matter of public safety. Therefore, the County respectfully requests that the Court allow it to file this exhibit under seal.
- 3. Pursuant to this Court's CM/ECF Administrative Procedures, the Declaration of Jeffrey S. Smith (Exhibit 9) is being submitted to the Court Clerks' office in conventional paper format with a PDF copy of the document on a disc.

WHEREFORE, the County respectfully requests that it be allowed to file Exhibit 9 to its Motion to Approve Interim Selection Methods for Security Officer and WWTP Supervisor and for Approval to Hire Additional Security Officers, the Declaration of Jeffrey S. Smith, under seal.

## Respectfully submitted,

/s/ David M. Smith
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## **CERTIFICATE OF SERVICE**

I certify that on this the 26th day of July, 2013, I have filed through the Court's CM-ECF system a copy of the foregoing pleading which should send an efiling notice to Counsel for all of the parties in this matter.

s/ Grace R. Murphy
OF COUNSEL